

“To-Be” Gap Analysis Implementation Steps

1. Gap Identification: LNRP Gap Number 1: Valuations: Office of Appraisal Services is reorganized under the DOI – National Business Center
2. Implementation Steps:
 - a. Step 1: Restructure the OST/OAS organization
 - i. Roles and responsibilities of appropriate parties are defined for National Business Center management and the OST Office of Appraisal Services
 - ii. Define policy for new compacts/contracts for Tribes
 - iii. Evaluate IT connectivity for OAS staff to access DOI systems
 - b. Step 2: Reinstitute the OAS Appraisal Technical Board that functions in an advisory capacity for the development of standard valuations policies and procedures for Indian trust lands
 - i. Identify responsibilities
 - ii. Identify membership and term limits
 - iii. Establish program review schedule

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3. Dependencies on Business Processes:

Business Process Name	Process Name (As specified in “To-Be” Model)	Dependency Description
BRDM		
Predecessors	1. None	
Successors	1. None	
FO		
Predecessors	1. None	
Successors	1. None	
LNRP – Wide Area Plan		
Predecessors	1. None	
Successors	1. None	
LNRP - Appraisals		
Predecessors	1. None	
Successors	1. None	
LNRUM		
Predecessors	1. None	
Successors	1. None	
Ownership – Title		
Predecessors	1. None	
Successors	1. None	
Ownership – Probate		
Predecessors	1. None	
Successors	1. None	
Ownership - Conveyance	1. None	

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Business Process Name	Process Name (As specified in “To- Be” Model)	Dependency Description
Predecessors	1. None	
Successors	1. None	
Ownership - Survey		
Predecessors	1. None	
Successors	1. None	

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4. Dependencies on Universal Support Functions:

Universal Support Function	Dependency Description
Automated System Requirements	1. Evaluate systems requirements and connectivity for OST/OAS staff to the DOI systems.
Policies, Procedures and Regulations	1. Revise appraisal handbook <ul style="list-style-type: none"> a. Establish valuation requirements for each type of trust transaction that is acceptable, reliable, and accurate. b. Issue policy statement that evidence of market value for low value/low risk transactions will be based on a market study in lieu of an appraisal. 2. Define policy of consolidated DOI/OAS and the OST/OAS office. 3. Restructure organization for reporting and appeals process
Training	1. Use of the existing DOI System(s) 2. Develop and implement standardized training on: <ul style="list-style-type: none"> a. Type of valuation for transaction type on individual requests for Indian trust lands b. Requesting a valuation. c. Interpreting and use of a completed valuation. d. Use of automated systems. 3. Summer internships established.
Records Management	1. Develop retention requirements for electronic records, forms, and signatures. 2. Secure storage of valuation data collected for wide-area planning. 3. Original individual valuations are stored by requesting office in case files.
Risk Assessment	1. Restrict access to valuation information to client (delegated line official at BIA) 2. Obtain security clearances for any DOI/OAS staff that will be working with Indian trust lands 3. Establish program review schedule
Workforce Planning	1. Establish Director Position for OST/Office of Appraisal Services. 2. Identify staffing requirements for the process functions including: <ul style="list-style-type: none"> a. Adequate appraisal staff in BIA Regions. Establish baseline for staffing requirements: Trust acreage, ownership, number of requests,

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Universal Support Function	Dependency Description
	<ul style="list-style-type: none"> tribal land, and allotted land. b. Personnel for compact/contract tribal programs. 3. Establish summer internships for appraisal program (target students and tribal members). 4. Develop an appraisers’ skills inventory that includes competencies, availability, and location.
Internal Controls / Fiduciary Security	<ul style="list-style-type: none"> 1. Trust land appraisal requirements for third-party contractors include: <ul style="list-style-type: none"> a. List of pre-approved state-certified appraisers. b. Standardized scope of work. 2. Build review, approval, and support into the valuation process for beneficiary intent. 3. Include certification timelines for newly hired appraisers who may not be state-certified. 4. EFOIA as well as FOIA/Privacy Act controls implemented on valuation data.

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1. Gap Identification: LNRP Gap Number 2: Valuations: Standardize Valuation Process
2. Implementation Steps
 - a. Step 1: Develop standardized appraisal process that provides for reservation-wide valuations as well as individual valuations.
Ensure the standardization of the following LNRP business processes:
 - i. P.1.1 Determine Appropriate Valuation Method:
 - a. Select method used:
 - Full self-contained, summary, and/or restricted report
 - Consultation statement
 - Feasibility study
 - Standard use rate schedule
 - AVM valuation
 - b. Prepare approved list of pre-approved appraisers/valuation specialists and make available to parties that may choose to contract for valuation services.
 - ii. P.1.2 Conduct Valuation
 - a. The Regional Appraiser (or assigned appraiser) authorizes the production of a valuation report by determining the preliminary scope of the report contained in the request package and in consultation with the requesting Agency Superintendent, Program Manager or Compacted/Contracted Tribal Realty Official.
 - b. 638 contracts/compacts include Regional Appraiser pre-approval (for fee contractors) of those who will conduct appraisals.
 - iii. P.1.3 Review Valuation:

OAS will ensure that all valuations of Trust lands are performed following generally accepted industry methods and within the scope of work expected from peers in the private sector and other federal agencies.
 - iv. P.1.4 Transmit Determination
 - a. Data from an approved wide-area valuation will be included in the development of the macro-level plan.
 - b. Data from an approved wide-area valuation will be included in the development of the beneficiary-developed plan.

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1. Gap Identification: LNRP Gap Number 2: Valuations: Standardize Valuation Process
2. Implementation Steps (continued)
 - b. Step 2: Develop or purchase automated valuation system
 - i. Develop training on submission requirements and use of automated valuation reports.
 - ii. Implement training on requesting and use of automated valuation reports.
 - iii. Produce valuation reports, usually market studies, for program area subunits determined by geographic differences, such as soil conditions, topography and cultural sites for both updating of the integrated data for planning and AVM generation..
 - c. Step 3: Use alternative valuation methods to arrive at an opinion of value for specific land and natural resource transactions:
 - i. Automated valuation models
 - a. Update integrated data with market studies, annually
Establish policy for input of market analyses, etc. and regular testing intervals
 - ii. Schedule for standard use rates
 - a. Complete market analysis of standard use rates for trust transaction on a regular basis, e.g., annually, semi-annually
 - d. Step 4: Develop an electronic records schedule

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3. Dependencies on Business Processes:

Business Process Name	Process Name (As specified in “To-Be” Model)	Dependency Description
BRDM		
Predecessors	1.B.2.4 Transfer Requests	1. Requests are received from BRDM for processing. <ol style="list-style-type: none"> Receive a request for a valuation from a beneficiary or the planning team. Receive a request for a valuation review from a beneficiary, another federal agency, or third party.
Successors	1.B.3 Communicate Information	1. Acceptance or rejection notifications of a valuation review, prepared by a third party, after DOI review will be communicated to a beneficiary through the delegated line official. An approved valuation is ready for distribution.
FO		
Predecessors	1.None	
Successors	1.None	
LNRP – Wide Area Plan		
Predecessors	1.None	
Successors	1. P.2.1.1 Request Resources 2. P.2.2 Collect Pertinent Data 3. P.3.1 Coordinate and Deliver Planning	1. The scope of the valuation is considered for setting the budget for wide-area planning. 2. Valuations are included in the development of the planning process. <ol style="list-style-type: none"> Data from an approved wide-area valuation will be included in the development of the macro-level plan. Data from an approved wide-area valuation will be included in the development of the beneficiary-prepared plan. 3. Valuations are provided at the request of the beneficiary-prepared plan.

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Business Process Name	Process Name (As specified in “To-Be” Model)	Dependency Description
	Assistance	
LNRP - Appraisals		
Predecessors	1. None	
Successors	1. None	
LNRUM		
Predecessors	1. None	
Successors	1. UM.1.1 Establish Management Unit Baseline 2. UM.2.1.3 Process Land Use Application	1. Baseline information is established for planning or contracting purposes. Valuations are ready for implementation within the integrated data. a. Integrated data is updated with appropriate grazing studies, market studies, mass valuations, and schedules for rights-of-way/easements, etc. b. An approved management unit or site-specific valuation is ready for implementation in the perfection of a contract.
Ownership – Title		
Predecessors	1. O.4.2 Receipt of Recorded Documents and Update Title	1. Access to title information, legal information, ownership, and encumbrances of record.
Successors	1. None	
Ownership – Probate		
Predecessors	1. None	
Successors	1. O.3.1. Prepare Probate Case 2. O.3.2 Adjudicate	1. Probate valuation is transmitted to client for submittal of case for adjudication. 2. Request may be initiated by ALJ for a valuation.
Ownership - Conveyance		
Predecessors	1. None	
Successors	1. O.1.1 Receive and	1. Conveyance valuation is transmitted to client for conveyance

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Business Process Name	Process Name (As specified in “To-Be” Model)	Dependency Description
	Review Application Request	transaction.
Ownership - Survey		
Predecessors	1. None	
Successors	1. None	

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4. Dependencies on Universal Support Functions:

Universal Support Function	Dependency Description
Automated System Requirements	<ol style="list-style-type: none"> 1. Implement Appraisal Tracking Management System. 2. Develop or purchase automated valuation methodology (AVM) software.
Policies, Procedures and Regulations	<ol style="list-style-type: none"> 1. Complete the revision of appraisal handbook that reflects restructure of OAS organization <ol style="list-style-type: none"> a. Establish valuation requirements for each type of trust transaction that is acceptable, reliable, and accurate. b. Issue policy statement that evidence of market value for low value/low risk transactions will be based on a market study in lieu of an appraisal. 2. Valuations requested initiated at the local level (e.g., agency or reservation) should be routed through the BIA agency realty officer acting as designee for the superintendent for tracking purposes.
Training	<ol style="list-style-type: none"> 1. Use of the Appraisal Tracking Management System 2. Develop and implement standardized training on: <ol style="list-style-type: none"> a. Type of valuation for transaction type on individual requests. b. Requesting a valuation. c. Interpreting and use of a completed valuation. d. Use of automated systems. 3. Summer internships established.
	<ol style="list-style-type: none"> 1. Develop retention requirements for electronic records, forms, and signatures. 2. Secure storage of valuation data collected for wide-area planning. 3. Original individual valuations are stored by requesting office in case files.
Risk Assessment	<ol style="list-style-type: none"> 1. Access to valuation information restricted to client (delegated line official at BIA). 2. Update of valuation information within integrated data restricted 3. Security clearances obtained for new hires or other DOI appraisers
Workforce Planning	<ol style="list-style-type: none"> 1. Identify staffing requirements for the process functions including: <ol style="list-style-type: none"> a. Adequate appraisal staff in BIA Regions. b. Personnel for compact/contract tribal programs. 2. Establish summer internships for appraisal program (target students and tribal members). 3. Develop an appraisers’ skills inventory that includes competencies, availability, and location.

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Universal Support Function	Dependency Description
Internal Controls / Fiduciary Security	<ol style="list-style-type: none"> 1. Trust land appraisal requirements for third-party contractors include: <ol style="list-style-type: none"> a. List of pre-approved state-certified appraisers. b. Standardized scope of work. c. New 638 contracts/compacts include pre-approval of (for fee contractors) of those who will conduct appraisals 2. Build review, approval, and support into the valuation process for beneficiary intent. 3. Include certification timelines for newly hired appraisers who may not be state-certified. 4. EFOIA as well as FOIA/Privacy Act controls implemented on valuation data contained in the wide-area plan. 5. Establish procedures for update of integrated data, e.g., regional appraiser only, testing intervals 6. Establish procedures for schedule of standard use rates, and testing intervals

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1. Gap Identification: LNRP Gap Number 3: Valuations: Minerals Appraisal Responsibility for Activities (Not associated with Minerals Leasing)
2. Implementation Steps:
 - a. Step 1: Develop authorities, responsibilities to designate the consolidated DOI – NBC Office of Appraisal Services as the responsible program for conducting miscellaneous appraisals of minerals on Indian trust lands not associated with minerals leasing
 - i. Determine policies and procedures for OAS
 - ii. Develop training on the policies and procedures
 - iii. Implement training on the policies and procedures
 - b. Step 2: Amend BLM MOU WO600-9111 Memorandum of Understanding between Bureau of Indian Affairs, the Bureau of Land Management, and the Minerals Management Service
 - i. Change BLM responsibility of “miscellaneous minerals appraisals” to DOI – NBC Office of Appraisal Services

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3. Dependencies on Business Processes:

Business Process Name	Process Name (As specified in “To-Be” Model)	Dependency Description
BRDM		
Predecessors	1. B.2.4 Transfer Requests	1. Requests are received from BRDM for processing. c. Receive a request for a minerals valuation from a beneficiary. d. Receive a request for a valuation review from a beneficiary, another federal agency, or third party.
Successors	1. B.3 Communicate Information	1. Minerals valuation review after DOI review will be communicated to a beneficiary and is ready for distribution.
FO		
Predecessors	1. None	
Successors	1. None	
LNRP – Wide Area Plan		
Predecessors	1. None	
Successors	1. P.2.1.1 Request Resources 2. P.2.2 Collect Pertinent Data 3. P.3.1 Coordinate and Deliver Planning Assistance	1. The scope of the minerals valuation is considered for setting the budget for wide-area planning. 2. Minerals valuations are included in the development of the planning process. Identify existing minerals assessments. a. Data from minerals valuations will be included in the development of the macro-level plan. b. Data from minerals valuations will be included in the development of the beneficiary-prepared plan. 3. Minerals valuations are provided at the request of the beneficiary-prepared plan.
LNRP - Appraisals		

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Business Process Name	Process Name (As specified in “To-Be” Model)	Dependency Description
Predecessors	1. None	
Successors	1. None	
LNRUM		
Predecessors	1. None	
Successors	1. UM.1.1 Establish Management Unit Baseline 2. UM 2.1.3 Process Land Use Application	1. Baseline information is established. 2. An approved management unit or site-specific minerals valuation is ready for implementation.
Ownership – Title		
Predecessors	1. O.4.2 Receipt of Recorded Documents and Update Title	1. Access to title information, legal information, ownership, and encumbrances of record.
Successors	1. None	
Ownership – Probate		
Predecessors	1. None	
Successors	1. O.3.1. Prepare Probate Case 2. O.3.2 Adjudicate	1. Minerals valuation information is within integrated data for probate submittal for adjudication. 2. Minerals valuation is transmitted to ALJ for adjudication.
Ownership - Conveyance		
Predecessors	1. None	
Successors	1. O.1.1 Receive and Review Application Request	1. Minerals valuation information is updated in integrated data for conveyance transaction.
Ownership - Survey		

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Predecessors	1. None	
Successors	1. None	

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4. Dependencies on Universal Support Functions:

Universal Support Function	Dependency Description
Automated System Requirements	<ol style="list-style-type: none"> 1. Implement Appraisal Tracking Management System. 2. Develop or purchase automated valuation methodology (AVM) software.
Policies, Procedures and Regulations	<ol style="list-style-type: none"> 1. Complete the revision of appraisal handbook that reflects restructure of OAS organization <ol style="list-style-type: none"> a. Establish valuation requirements for each type of trust transaction that is acceptable, reliable, and accurate. b. Issue policy statement that evidence of market value for low value/low risk transactions will be based on a market study in lieu of an appraisal. 2. Valuations requested initiated at the local level (e.g., agency or reservation) should be routed through the BIA agency realty officer acting as designee for the superintendent for tracking purposes.
Training	<ol style="list-style-type: none"> 1. Use of the Appraisal Tracking Management System 2. Develop and implement standardized training on: <ol style="list-style-type: none"> a. Type of valuation for transaction type on individual requests. b. Requesting a valuation. c. Interpreting and use of a completed valuation. d. Use of automated systems. 3. Summer internships established.
Records Management	<ol style="list-style-type: none"> 1. Develop retention requirements for electronic records, forms, and signatures. 2. Secure storage of valuation data collected for wide-area planning. 3. Original individual valuations are stored by requesting office in case files.
Risk Assessment	<ol style="list-style-type: none"> 1. Access to valuation information restricted to client (delegated line official at BIA). 2. Update of valuation information within integrated data restricted 3. Security clearances obtained for new hires or other DOI appraisers
Workforce Planning	<ol style="list-style-type: none"> 1. Identify staffing requirements for the process functions including: <ol style="list-style-type: none"> a. Adequate appraisal staff in BIA Regions. b. Personnel for compact/contract tribal programs. 2. Establish summer internships for appraisal program (target students and tribal members). 3. Develop an appraisers’ skills inventory that includes competencies, availability, and location.

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Universal Support Function	Dependency Description
Internal Controls / Fiduciary Security	<ol style="list-style-type: none"> 1. Trust land appraisal requirements for third-party contractors include: <ol style="list-style-type: none"> a. List of pre-approved state-certified appraisers. b. Standardized scope of work. c. New 638 contracts/compacts include pre-approval of (for fee contractors) of those who will conduct appraisals 2. Build review, approval, and support into the valuation process for beneficiary intent. 3. Include certification timelines for newly hired appraisers who may not be state-certified. 4. EFOIA as well as FOIA/Privacy Act controls implemented on valuation data contained in the wide-area plan. 5. Establish procedures for update of integrated data, e.g., regional appraiser only, and testing intervals 6. Establish procedures for schedule of standard use rates, and testing intervals